



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street, 3rd floor
New York, New York 10007

February 19, 2015

BY FACSIMILE

The Honorable Michael H. Dolinger
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Barone v. United States, et al.*, No. 12-cv-4103 (LAK) (MIID)

Dear Judge Dolinger:

This office represents Defendants the United States of America, Agent Michael Gaeta, Agent Gregorio Miceli, and Agent Michael Trombetta in the above-referenced action. After conferring with Plaintiff's counsel and reaching mutual agreement as to the requests herein, we write respectfully and on behalf of Defendants and Plaintiff to request short extensions of time to file: (1) Defendants' reply in support of their motion to dismiss the Amended Complaint and Defendants' opposition to Plaintiff's cross-motion to unseal grand jury materials, from February 20, 2015, to February 24, 2015; and (2) Plaintiff's reply in support of his cross-motion to unseal grand jury materials, from February 27, 2015, to March 6, 2015. *See* Dkt. No. 64. The reason for Defendants' request is that, especially in view of the new issues raised by Plaintiff's cross-motion, the Government requires additional time to thoroughly prepare, finalize, and obtain review within the Government of Defendants' reply and opposition papers. The reason for Plaintiff's request is the unavailability of Plaintiff's counsel at the end of this month and the beginning of March due to preparation for a mediation in another case.

No previous requests for extensions of these deadlines have been made. Counsel for Defendants and for Plaintiff have conferred and mutually consent to these requests. Thank you for your consideration of this matter.

Respectfully,
PREET BHARARA
United States Attorney

By: /s/ Rebecca S. Tinio
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ENDORSED ORDER
Application granted

M/USM
2/19/15

FAX Cover Sheet

Date: February 19, 2015

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Re: Barone v. United States of America et al
12 cv 04103 (LAK) (MHD)

Text of enclosed endorsed order: "Application granted."

From: Magistrate Judge Michael H. Dolinger
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Southern District of New York
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